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September 23, 2020

**VIA ELECTRONIC FILING**

Honorable Margaret Cangilos-Ruiz  
United States Bankruptcy Court  
Northern District of New York  
100 South Clinton Street  
Syracuse, New York 13202

Re: *River Meadows, LLC; Chapter 7 Case No. 19-30022*

Dear Judge Cangilos-Ruiz:

We represent Liberty Senior Holdings, LLC, a creditor and party in interest in the above-captioned chapter 7 case. Enclosed for the Court's consideration, please find a proposed Order Approving Settlement Agreements Pursuant to Federal Rule of Bankruptcy Procedure 9019(a) in connection with the above-referenced case. Although my client was not the movant with respect to the *Motion by Chapter 7 Trustee for Entry of an Order Approving Settlement Agreements Pursuant to Federal Rule of Bankruptcy Procedure, 9019(a)* [Docket No. 81], the Chapter 7 Trustee for River Meadows, LLC, William J. Leberman, has requested that we submit the proposed order to the Court for consideration.

The proposed order has been circulated to the parties to the Trustee Settlement Agreement and these parties have indicated their consent to the relief requested in the proposed Order by signature. We have also circulated the proposed order to the Office of the United States Trustee and counsel for objecting party CMS Compliance Group, Inc.

The Office of the United States Trustee withdrew their objection on the record at the August 13, 2020 hearing. Although objecting party CMS Compliance Group, Inc. has not consented to the relief requested in the 9019 motion, we believe that the proposed Order meets the concerns and requirements of the Court expressed during the August 13, 2020 hearing in order to allow the Court to approve the Order over the objection of CMS Compliance Group, Inc.

The parties plan to appear telephonically at the hearing scheduled for tomorrow in the event the Court has any questions or concerns with respect to the proposed Order. If the proposed Order meets with the Court's approval, I would request that your Honor sign the proposed Order and ask that your Clerk file the original with the Clerk's Office.

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Thank you for your Honor's consideration in this matter.

Respectfully submitted,

BOND, SCHOENECK & KING, PLLC



Sara C. Temes

SCT/kmd  
Enclosure

cc: Daniel J Hurteau, Esq. (w/enclosure)  
William J. Leberman, Esq. (w/enclosure)  
Erin Champion, Esq. (w/enclosure)  
Nicole Marlow-Jones (w/enclosure)